

May 10, 2023

Via CM/ECF

The Honorable Naomi Reice Buchwald  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *In re Libor-Based Financial Instruments Antitrust Litigation*, Case No. 11-md-2262

Dear Judge Buchwald:

We serve as liaison counsel for the Class Plaintiffs, the Direct Action Plaintiffs, and the Defendants in the above-referenced LIBOR MDL. The parties write jointly with a ministerial request that Your Honor enter the attached, updated proposed scheduling order to clarify certain of the deadlines in the case management schedule that was ordered by the Court on July 5, 2022 (the “July 2022 Scheduling Order”). *See* ECF No. 3425.

The July 2022 Scheduling Order contains “estimated deadlines” from the parties’ joint proposed case management schedule, whereas the actual operative deadlines under the terms of the schedule are determined based on the date of the Court’s order on any motions to compel on custodians and search terms. The Court entered an order on Plaintiffs’ motion to compel on April 10, 2023. *See* ECF No. 3655. The attached updated proposed scheduling order replaces the “estimated deadlines” with the deadlines called for by the schedule, keyed off of the order date of April 10, 2023.

Accordingly, to avoid any potential confusion, the parties jointly request that the Court so-order the attached updated proposed scheduling order.

Respectfully Submitted,

/s/ William Christopher Carmody  
William Christopher Carmody

Liaison Counsel for the Class Plaintiffs and  
Co-Lead Counsel for the OTC Class

/s/ James Robertson Martin  
James Robertson Martin

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/s/ Paul S. Mishkin  
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